

March 2, 2009

Technical Director
Financial Accounting Standards Board
301 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116



LETTER OF COMMENT NO. 30

Via email: director@fasb.org

File Reference: Proposed FSP FAS 107-b and APB 28-a (*Interim Disclosure about Fair Value of Financial Instruments*)

Dear Technical Director:

Our bank appreciates the opportunity to comment on the Proposed FSP FAS 107-b and APB 28-a (Interim Disclosure about Fair Value of Financial Instruments). ViewPoint Bank is a stock saving bank, 100% held by ViewPoint Financial Group. The Bank is based in Plano, Texas with \$2.0 billion in assets. It currently operates 30 community bank offices and 16 loan production offices.

We do not support the FASB's Proposed FASB FSP FAS 107-b and APB 28-a and we urge you to reject the proposal until more discussion takes place regarding the costs of providing this information, including the time required to prepare the information, can be assessed. We believe, from a cost/benefit perspective, the costs of providing this vast amount of information on a quarterly basis greatly exceeds the value that is derived by such disclosures for our banking institution and our financial statement users.

Each year-end, we utilize a sophisticated modeling tool which takes significant staff time to collect data and model fair value results. In addition, to the modeling, a complete audit and evaluation of the model is completed by our outside audit firm to comply with the current disclosure requirements of SFAS 107. However, per our investor and customer relations departments, we receive no inquiries and follow-ups to this data in our annual reports. With this in mind, we believe there will be little incremental benefit derived from such information provided on a quarterly basis.

Thank you for your attention to these matters and for considering our views.

Sincerely,

Patti McKee
Executive Vice President, CFO
ViewPoint Bank